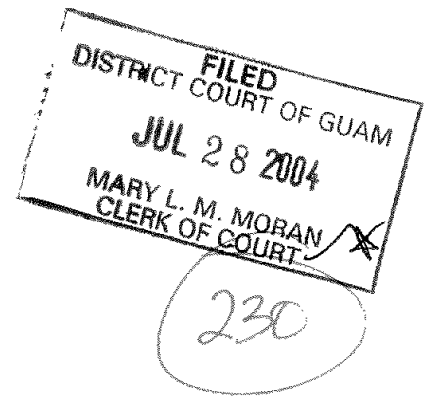


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IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)
SADHWANI, and K. SADHWANI'S)
INC., a Guam corporation,)
)
Plaintiffs,)
)
v.)
)
HONGKONG AND SHANGHAI)
BANKING CORPORATION, LTD.,)
et al.,)
Defendants.)
_____)

CIVIL CASE NO. 03-00036

**NOTICE OF MOTION
AND MOTION FOR ORDER
COMPELLING DISCOVERY
ON SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS**

**TO: PLAINTIFFS, AND THEIR COUNSEL OF RECORD, ARRIOLA COWAN &
ARRIOLA**

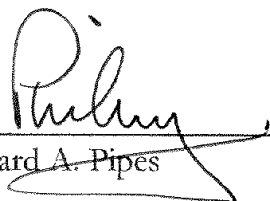
Notice is hereby given that on the _____ day of _____, 2004, at _____
_ a.m. or as soon thereafter as the matter can be heard at the District Court of Guam, 4th Floor,
U. S. Courthouse, 520 West Soledad Avenue, Hagåtña, Guam 96910, Defendant Hongkong

and Shanghai Banking Corporation, Ltd. ("HSBC") will move the Court for an Order, pursuant to Rule 37 of the Federal Rules of Civil Procedure, compelling Plaintiffs to produce documents requested pursuant to a Second Request for Production of Documents which Plaintiffs have failed and refused to produce. HSBC will also move the Court for an Order imposing monetary sanctions in an amount to be later proven for the failure and refusal of Plaintiffs to produce documents requested, because of Plaintiffs' non-cooperation, and because of the attorneys fees and expenses incurred by HSBC in filing the motion herein.

The motion will be based upon this Notice of Motion, Ex Parte Application, the Declaration of Richard A. Pipes, the Memorandum of Points and Authorities concurrently filed herein and the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the motion.

Dated this 26th day of July, 2004.

LAW OFFICES OF RICHARD A. PIPES
Attorneys for HSBC

By: 
Richard A. Pipes

RAP/nsh

